

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KHYATI ANDREWS,

Plaintiff,

V.

**SEARS HOLDINGS CORPORATION,
d/b/a SEARS,**

Defendant.

NO. 08 C 406

Hon. Ronald A. Guzman
Judge Presiding
Magistrate Judge Mason

REPORT OF PARTIES' PLANNING MEETING

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held on February 18, 2008, telephonically, and was attended by:

Lisa Kane for Plaintiff

Grady B. Murdock for Defendant

2. Pre-Discovery Disclosures. The parties have exchanged (or) will exchange by February 28, 2008, the information required by Fed. R. Civ. P. 26(a)(1).

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects: Plaintiff's claims of race discrimination retaliation, and damages, and Defendant's defenses.

The parties jointly propose that all discovery commenced in time to be completed by July 15, 2008.

The parties do not anticipate any modifications will be necessary to the discovery requirements of the Federal Rules of Civil Procedure or Local Rules.

Plaintiff estimates eight to ten depositions will be necessary, however, once Rule 26(a)(1) Disclosures have been exchanged, counsel for Plaintiff will be in a position to be more definitive. Defendant presently estimates five (5) to seven (7) depositions will be necessary for it to take; however, once Rule 26(a)(1) Disclosures have been exchanged, counsel for Defendant will be in a better position to make an informed estimate. Defendant may require additional depositions depending on the course of discovery.

The parties do not anticipate the use of experts at this time subject to issues found during discovery and/or following Rule 26(a)(1) Disclosures. If such position is altered by either of the parties, experts will be disclosed in accordance with Federal Rule of Civil Procedure Rule 26 (a)(2) by June 15, 2008.

Supplementation required under Rule 26(e) will be in accordance with that Rule.

4. OTHER ITEMS.

The parties do not request a conference with the court before entry of the scheduling order. The parties request a pretrial conference sixty (60) days after the Court rules on dispositive motions.

Plaintiff should be allowed until April 30, 2008 to join additional parties and to amend the pleadings.

Defendants should be allowed until April 30, 2008 to join additional parties and to amend the pleadings.

All potentially dispositive motions should be filed by:

Plaintiff proposes August 15, 2008

Defendant proposes August 30, 2008

Final Pretrial order: Plaintiff to prepare proposed draft thirty (30) days after ruling on any dispositive motion; parties to file joint final pretrial order within forty-five (45) days of ruling on any dispositive motion.

The case should be ready for trial by November of 2008 and at this time is expected to take approximately three (3) to four (4) days.

OTHER MATTERS:

Settlement: Plaintiff will provide a written settlement demand. Defendant is willing to carefully consider and respond to any reasonable settlement demand made by Plaintiff.

Absent a settlement demand by Plaintiff, Defendant does not propose to make a settlement proposal at this time.

The parties **DO NOT consent unanimously to proceed before a Magistrate**

Judge.

Dated: February 26, 2008

s/ Lisa Kane
LISA KANE
LISA KANE & ASSOCIATES, P.C.
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s/ Terese M. Connolly (by consent)
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